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15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

17 UNITED STATES OF AMERICA,

18 Plaintiff,

19 vs.

20 MICHAEL RICHARD LYNCH AND
21 STEPHEN KEITH CHAMBERLAIN

22 Defendants.

23 CASE NO. 3:18-cr-00577-CRB

24 **Defendant Stephen Chamberlain's
25 Unopposed Administrative Motion for
26 Leave to Exceed Page Limitations for:**

27 **(1) Motion to Dismiss Counts One through
28 Fifteen and Seventeen of the Superseding
Indictment, and**

29 **(2) Motion to Compel the Government to
30 Secure the Trial Attendance of Rob Knight
31 or, in the Alternative, to Issue a Rule 15
32 Order and Letters Rogatory**

33 Assigned to Hon. Charles R. Breyer

1 Defendant Stephen Chamberlain moves for leave to exceed the fifteen-page limit specified
 2 in Rule I.C of the Court's General Standing Order for Civil and Criminal Cases for his memoranda
 3 of points of authorities in support of two motions he is filing: (1) his Motion to Dismiss Counts
 4 One through Fifteen and Seventeen of the Superseding Indictment ("Motion to Dismiss"); and (2)
 5 his Motion to Compel the Government to Secure the Trial Attendance of Rob Knight or, in the
 6 Alternative, to Issue a Rule 15 Order and Letters Rogatory as to Such Witness ("Motion to
 7 Compel").

8 Mr. Chamberlain respectfully requests leave to file a memorandum of points and
 9 authorities of up to twenty-five pages in support of each motion. The government does not oppose
 10 this request.

11 The Motion to Dismiss sets forth the factual bases for all sixteen counts at issue and the
 12 government's extensive efforts to toll the statutes of limitations for each. It calculates and
 13 addresses the timeliness of each of the sixteen counts under multiple scenarios involving different
 14 potential theories of tolling. An additional ten pages will permit Mr. Chamberlain to fully develop
 15 his arguments for dismissing each count.

16 The Motion to Compel is, in substance, three motions in one: (1) a motion to compel the
 17 government to secure Mr. Knight's appearance at trial, (2) in the alternative, a motion for Mr.
 18 Knight's deposition pursuant to Rule 15(a), and (3) a request for the issuance of letters rogatory.
 19 An additional ten pages will permit Mr. Chamberlain to set forth the legal authorities and factual
 20 support for all three motions and will remove the necessity of filing them separately.

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1 For these reasons, Mr. Chamberlain respectfully requests that the Court enter an order
2 permitting him to file memoranda of points and authorities of up to twenty-five pages in length in
3 support of the Motion to Dismiss and the Motion to Compel.

4 | DATED: September 29, 2023 Gary S. Lincenberg

Gary S. Lincenberg

Ray S. Seilie

Michael C. Landman

Bird, Marella, Boxer, Wolpert, Nessim,
Drooks, Lincenberg & Rhow, P.C.

By: /s/ Gary S. Lincenberg

Gary S. Lincenberg

Atorneys for Defendant Stephen Keith
Chamberlain

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3 **UNITED STATES DISTRICT COURT**

4 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

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6 UNITED STATES OF AMERICA,

7 Plaintiff,

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9 MICHAEL RICHARD LYNCH AND
10 STEPHEN KEITH CHAMBERLAIN

11 Defendants.

CASE NO. 3:18-cr-00577-CRB

[Proposed] Order

Assigned to Hon. Charles R. Breyer

12
13 The Court has reviewed Defendant Stephen Chamberlain's Unopposed Administrative
14 Motion for Leave to Exceed Page Limitations for (1) Motion to Dismiss Counts One through
15 Fifteen and Seventeen of the Superseding Indictment, and (2) Motion to Compel the Government
16 to Secure the Trial Attendance of Rob Knight or, in the Alternative, to Issue a Rule 15 Order and
17 Letters Rogatory (the "Administrative Motion"). Finding good cause, the Court GRANTS the
18 Administrative Motion. Mr. Chamberlain is permitted to file memoranda of points and authorities
19 of up to twenty-five pages in support of (1) his Motion to Dismiss Counts One through Fifteen and
20 Seventeen of the Superseding Indictment, and (2) his Motion to Compel the Government to Secure
21 the Trial Attendance of Rob Knight or, in the Alternative, to Issue a Rule 15 Order and Letters
22 Rogatory.

23 IT IS SO ORDERED.

24
25 DATED: _____

26 The Honorable Charles R. Breyer
27 United States District Judge